

10:29:01

1 first started, you started working at Kitty Hawk. And
2 this indicates that for your first campus assignment,
3 number 42, you're representing to me that that you
4 think that was Kitty Hawk?

10:29:04

5 A. Yes.

10:29:09

10:29:11

10:29:13

6 Q. Okay. And it looks like at some point about
7 seven pages in here, there was a campus where the home
8 campus notation indicates a number 43. Do you see
9 where I'm looking?

10:29:27

10:29:34

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10 A. Yes.

10:29:40

10:29:44

11 Q. And where did -- where did you work after Kitty
12 Hawk? Do you remember?

10:29:45

13 A. At Woodlake Hills.

10:29:47

14 Q. So in 1997 you went to Woodlake Hills?

10:29:50

15 A. Yes.

10:29:54

16 Q. So 43 would be Woodlake Hills; correct?

10:29:59

17 A. I think, yes.

10:30:03

18 Q. And in 1997 when you went to Woodlake Hills,
19 did your sister work at Woodlake Hills?

10:30:09

10:30:11

20 A. Yes, I think so.

10:30:12

21 Q. Was she a principal there?

10:30:13

22 A. She was an assistant principal.

10:30:15

23 Q. And who was the principal?

10:30:17

24 A. John Snowdy.

10:30:25

25 Q. Okay. As assistant principal did you report to

10:30:28

1 your sister?

2 A. Yes.

10:30:32

3 Q. So she was your supervisor?

10:30:34

4 A. Mr. Snowdy was my supervisor.

10:30:36

5 Q. Was your sister also a supervisor or no?

10:30:40

6 A. I don't know what you mean by supervisor. Yes.

10:30:44

7 I guess the answer is yes.

10:30:46

8 Q. Well, did -- did she participate in any

10:30:50

9 evaluations of you or walk-throughs or observations?

10:30:53

10 A. Walk-throughs.

10:30:55

11 Q. So her walk-throughs were part of an evaluation

10:31:00

12 process that had to be conducted for teachers; correct?

10:31:03

13 A. Right.

10:31:04

14 Q. Was there any other assistant principal at

10:31:07

15 Woodlake Hills Middle School?

10:31:08

16 A. There were three or -- three or four.

10:31:10

17 Q. Three or four?

18 A. Yes.

10:31:11

19 Q. Did other -- did those assistant principals

10:31:15

20 also participate in walk-throughs of you --

21 A. Yes.

10:31:18

22 Q. -- as you were teaching?

23 A. Yes.

10:31:20

24 Q. Okay. So all of the assistant principals you

10:31:23

25 would say would be your supervisor in addition to

10:31:26

1 Mr. Snowdy?

10:31:28

2 A. Snowdy.

10:31:28

3 Q. Snowdy?

10:31:29

4 A. Yes.

5 Q. Is that correct?

10:31:29

6 A. Yes.

10:31:32

7 Q. Okay. Because, basically, you've got the

10:31:33

8 principal and then you've got the assistant principal

10:31:36

9 and that's kind of the management of that campus;

10:31:39

10 correct?

11 A. Yes.

10:31:40

12 Q. And underneath that management umbrella are

10:31:43

13 the -- the teachers and staff; correct?

10:31:44

14 A. Correct.

10:31:48

15 Q. Okay. Did you have one specific assistant

10:31:50

16 principal that you had to report to or were you

10:31:54

17 required to answer to all the assistant principle as

10:31:58

18 well as the principal?

10:31:59

19 A. I recall not just one, all of them.

10:32:01

20 Q. All of them?

21 A. Yes.

10:32:06

22 Q. And would -- would they all be involved in the

10:32:09

23 evaluation process?

10:32:09

24 A. Yes. Like you -- like you said walk-throughs,

10:32:12

25 yes.

10:32:12

1 Q. Okay.

10:32:12

2 A. And evaluations.

10:32:15

3 Q. Okay. So their input would contribute to a

10:32:18

4 teacher's evaluation?

5 A. Yes.

10:32:24

6 Q. Okay. So in 1997 your sister was an assistant

10:32:28

7 principal there?

10:32:28

8 A. Yes. I --

10:32:29

9 Q. Do you -- I'm sorry?

10:32:30

10 A. I think. You know, I'm bad with dates, so I

10:32:33

11 think around about that time, '97, yes.

10:32:38

12 Q. Okay. And do you recall when she became

10:32:42

13 principal?

10:32:42

14 A. No, I don't.

10:32:43

15 Q. Do you recall when Ms. Ruffin became principal?

10:32:50

16 A. I think it was 2001.

10:33:18

17 Q. And if I'm looking at these documents

10:33:20

18 correctly, from 1997, which is at page 7, through the

10:33:25

19 end, you were -- your home campus was number 43, which

10:33:30

20 would have been Woodlake Hills; correct?

21 A. Yes.

10:33:37

22 Q. Okay. Do you recall if Ms. Ruffin started with

10:33:40

23 the district in 2001 as an assistant principal or did

10:33:44

24 she come in as a principal?

10:33:45

25 A. She came in as a principal.

10:33:48

1 Q. From another part of the district or from
2 another school district all together?

10:33:50

10:33:52

3 A. She came from Lafayette, Louisiana.

10:33:56

10:34:05

4 Q. Okay. And when she came, did she -- her coming
5 get -- make -- sorry, let me rephrase. Did her coming
6 to the district and coming specifically to Woodlake
7 Hills mean that your sister was no longer employed at
8 the district?

10:34:10

10:34:12

10:34:15

10:34:17

9 A. She was still employed.

10:34:21

10:34:24

10 Q. But you said she was the principal at Woodlake
11 Hills?

12 A. Yes.

10:34:25

10:34:30

13 Q. So when Ms. Ruffin came, she was the principal
14 at Woodlake Hills; correct?

10:34:32

15 A. That's correct.

10:34:33

16 Q. So somebody had to go?

10:34:36

17 A. Exactly.

10:34:36

18 Q. And who had to go?

10:34:40

19 A. Dr. Zukowski, her -- Ms. Ruffin's

10:34:44

20 brother-in-law at that time removed my sister from that
21 school and placed Ms. Ruffin there.

10:34:47

10:34:51

22 Q. So Dr. Zukowski was Ms. Ruffin's

10:34:55

23 brother-in-law?

10:34:55

24 A. Former brother-in-law.

10:34:57

25 Q. Okay. And if I heard you correctly, you said

10:35:00

1 that he placed Ms. Ruffin there. And did he nonrenew
2 your sister's contract?

10:35:06

10:35:06

3 A. No, he didn't.

10:35:07

4 Q. What did he do?

10:35:09

5 A. He placed her -- he -- at first -- his first

10:35:14

6 intent was to place her at another school, but then she

10:35:17

7 was placed in district office.

10:35:23

8 Q. Okay. Was there some kind of discrimination in
9 his doing that?

10:35:25

10:35:27

10 A. I have no idea, ma'am.

10:35:28

11 Q. Did you feel like there was?

10:35:32

12 A. I didn't feel too good about it, neither did my
13 sister.

10:35:35

10:35:36

14 Q. Why not?

10:35:38

15 A. Why would she? When she was doing the job, why
16 would she feel good about it? That's the only answer I
17 have for that.

10:35:43

10:35:47

10:35:49

18 Q. Were -- was it fair to say that you were not
19 happy about it?

10:35:51

10:35:57

20 A. It would be very fair to say that, yes, ma'am.

10:35:59

21 Q. Would it be fair to say that you were angry
22 about it?

10:36:02

10:36:03

23 A. Well, I'm -- I wasn't happy about it.

10:36:08

24 Q. Okay. And were you angry at Dr. Zukowski about
25 it?

10:36:12

10:36:12

1 A. I wouldn't -- I was not angry at -- I was angry
2 about the decision, about the move. I was upset about
3 it, so was my sister.

10:36:19

10:36:24

10:36:26

4 Q. And you feel -- I'm sorry.

10:36:29

10:36:37

10:36:40

5 A. I felt that she was doing the job, so why
6 should she be moved and someone else placed there,
7 someone new.

10:36:41

10:36:43

8 Q. Seemed unfair to you?

10:36:43

9 A. Very unfair.

10:36:49

10 Q. And did your sister complain about that?

10:36:49

11 A. Yes, she did.

10:36:51

12 Q. Did you complain about it?

10:36:54

13 A. No. I -- I listened to her and I tried to help
14 her get through it, to be honest with you.

10:37:00

10:37:06

15 Q. And when you said that she complained about it,
16 did she complain about it to the district?

10:37:08

10:37:10

17 A. I don't have any idea about that, ma'am. I
18 don't know if she did or not.

10:37:13

10:37:16

19 Q. Did you complain --

10:37:17

20 A. A great deal of it -- I'm sorry?

10:37:18

21 Q. No, I'm sorry.

10:37:19

22 A. A great deal of it, she kept it to herself.

10:37:22

23 She made some statements to me, but she kept most of it
24 to herself. So I don't know if she complained to

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10:37:28

25 anyone else or not.

10:37:28

1 Q. Now, I asked you, I think, did you complain
2 about it?

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10:37:40

3 A. You mean to the district or to someone in
4 the --

10:37:42

10:37:42

5 Q. Just in general.

10:37:43

10:37:45

6 A. I didn't talk about it anymore because I didn't
7 want to upset my sister anymore than she was. If she
8 didn't talk about it, I didn't talk about it.

10:37:49

10:37:50

9 Q. So you didn't complain to the district about
10 it?

10:37:53

10:37:53

11 A. No. That was not my place to do that.

10:37:57

10:38:07

12 Q. Do you -- do you think that the fact that
13 Ms. Ruffin replaced your sister was discriminatory in
14 any way?

10:38:12

10:38:12

15 MR. WAOBIKEZE: Objection, form.

10:38:13

16 A. I can't answer that.

17 BY MS. HISEL:

10:38:15

18 Q. Well, you said you felt it was unfair?

10:38:18

19 A. Yes, I did.

10:38:22

10:38:25

20 Q. And you said that you felt it was unfair
21 because you didn't understand the reason for it. But
22 do you think that there was a reason -- for example, in
23 this -- the reason why we're here today, you had -- you
24 have made some claims, some of which involve race, age,
25 color, and sex; right?

10:38:36

10:38:40